

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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TODD WOLF,

Plaintiff,

Case No.: 23-cv-149

v.

CITY OF SHEBOYGAN, MAYOR RYAN  
SORENSEN in his individual and official capacity,  
CITY ATTORNEY CHARLES ADAMS in his  
individual and official capacity, ALDERWOMAN  
BARBARA FELDE, in her individual and official  
capacity, ALDERWOMAN ROBERTA FILICKYPENESKI,  
in her individual and official capacity,  
ALDERWOMAN AMANDA SALAZAR, in her  
individual and official capacity, ALDERWOMAN  
ANGELA RAMEY, in her individual and official  
capacity, ALDERWOMAN BETTY ACKLEY, in her  
individual and official capacity, ALDERMAN  
ZACHARY RUST, in his individual and official  
capacity, ALDERMAN DEAN DEKKER, in his  
individual and official capacity, ALDERWOMAN  
GRAZIA PERRELLA, in her individual and official  
capacity, PRESIDENT SHEBOYGAN AREA SCHOOL  
DISTRICT MARY LYNNE DONOHUE, in her  
individual capacity; MAYA HILTY; and JILL HALL,

Defendants.

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**STIPULATED CIVIL L.R. 7(H) EXPEDITED NON-DISPOSITIVE  
MOTION TO ENLARGE TIME TO  
ANSWER OR OTHERWISE PLEAD TO THE COMPLAINT**

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Plaintiff Todd Wolf and Defendants City of Sheboygan, Mayor Ryan Sorenson, City Attorney Charles Adams, Alderwoman Barbara Felde, Alderwoman Roberta Filicky-Peneski, Alderwoman Amanda Salazar, Alderwoman Angela Ramey, Alderwoman Betty Ackley, Alderman Zachary Rust, Alderman Dean Dekker, Alderwoman Grazia Perrella, and President

Sheboygan Area School District Mary Lynne Donohue (“Defendants”) by and through their respective counsel, agree, stipulate and move this Court, pursuant to Civil L.R. 7(h), for an Order to enlarge the timeframe for initial responsive pleadings in this matter to March 29, 2023. In support of this Stipulated Motion, the Parties state as follows:

1. The above captioned cause of action was filed on February 6, 2023.
2. On February 6, 2023, the City of Sheboygan, Alderwoman Barbara Felde, Alderwoman, Roberta Filicky-Peneski, Alderwoman Betty Ackley, Alderman Zachary Rust, Alderman Dean Dekker, Alderwoman Grazia Perrella were served with Plaintiff’s Complaint. Those Defendants responsive pleading to the Complaint is due on February 26, 2023.
3. On February 7, 2023, Mary Lynne Donohue and Charles Adams were served with Plaintiff’s Complaint. Those Defendants responsive pleading to the Complaint is due on February 27, 2023.
4. On February 13, 2023, Amanda Salazar was personal served with Plaintiff’s Complaint. Her responsive pleading to the Complaint is due on March 6, 2023.
5. On February 20, 2023, Angela Ramey was personally served with Plaintiff’s Complaint. Her responsive pleading to the Complaint is due on March 13, 2023.
6. The Parties have conferred about matters concerning this case and have agreed that an enlargement of time in which Defendants have to answer or otherwise plead in response to the Complaint is warranted, as Defendants need additional time to investigate and respond to allegations in the Complaint.
7. The Parties therefore agree that Defendants shall have up to and including **March 29, 2023**, in which to file and serve their answer or other responsive pleading in response to

Plaintiff's Complaint in this matter. The Parties further agree that an Order in accordance with the foregoing may be entered without further submission by either party.

8. A scheduling order is not in place yet and the foregoing proposed enlargement of time for initial responsive pleadings will not prejudice the Parties or unduly delay this case.

Dated: February 24, 2023.

**MWH LAW GROUP LLP**

*Electronically signed by Warren E. Buliox*

Warren E. Buliox SBN 1056215

Julit T. Bittner SBN 1128144

Kerrie M. Murphy SBN 1122869

MWH Law Group LLP

735 N. Water Street, Suite 610

Milwaukee, WI 53202

(414) 436-0353

warren.buliox@mwhlawgroup.com

julie.bittner@mwhlawgroup.com

kerrie.murphy@mwhlawgroup.com

**COUNSEL FOR DEFENDANTS**

**DEMASTER LAW LLC**

*Electronically signed by Jennifer DeMaster*

Jennifer De Master, SBN 1124201

DeMaster Law LLC

361 Falls Rd. #610

Grafton, WI 53024

(414) 235-7488

attorney@jennifermaster.com

**COUNSEL FOR PLAINTIFF**

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 24, 2023, a copy of this document was served upon all parties in the above cause by **electronic document management system (“ECF”)**, which will send notification of such filing to all attorneys of record.

**Attorneys for Plaintiff Todd Wolf**

Jennifer DeMaster     SBN: 1124201  
DeMASTER LAW LLC  
361 Falls Road, #610  
Grafton, WI 53024  
Telephone: (414) 235-7488  
Facsimile: (262) 536-0515

**Attorneys for Defendant Maya Hilty**

Brian C. Spahn  
GODFREY & KAHN, S.C.  
833 East Michigan Street, Suite 1800  
Milwaukee, WI 53202  
Telephone: (414) 273-3500  
Facsimile: (414) 273-5198

/s/ Brooke E. Klingbeil